UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

THOMAS ROGER WHITE, JR. and PATRICIA CAULEY on behalf of themselves and all others similarly situated,

Plaintiffs,

V.

SAMSUNG ELECTRONICS AMERICA, INC. and SONY ELECTRONICS INC.,

Defendants.

Civil Action No. 17-1775 (MCA) (JAD)

Document Electronically Filed

NOTICE OF MOTION TO COMPEL INDIVIDUAL (NON-CLASS) ARBITRATION AND/OR DISMISS FOR LACK OF JURISDICTION

PLEASE TAKE NOTICE that on June 15, 2020, at 9:30 a.m., or at such other date and time as may be set by the Court, Defendant Sony Electronics Inc., ("Defendant") by and through their undersigned attorneys, will move before the Honorable Madeline Cox Arleo, U.S.D.J., United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Courtroom MLK 4A, Newark, New Jersey 07101, to compel individual (nonclass) arbitration and/or dismiss for lack of jurisdiction.

PLEASE TAKE FURTHER NOTICE that in support of this Motion,
Defendant will rely on the accompanying Memorandum of Law in Support of their
Motion to Compel Individual (Non-Class) Arbitration and/or Dismiss for Lack of
Jurisdiction and all pleadings and proceedings on file.

PLEASE TAKE FURTHER NOTICE that a Proposed form of Order is being submitted herewith.

PLEASE TAKE FURTHER NOTICE that Defendant hereby requests oral argument.

Dated: May 22, 2020 Respectfully submitted,

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